

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA	)	
	)	
v.	)	3:17-CR-00065-CRB-1
	)	
BARRY CLINTON WILLIAMS	)	

**SENTENCING MEMORANDUM**

BARRY CLINTON WILLIAMS, pursuant to N.D. CAL. L. R. 32-5(b), respectfully submits the following for this Court's consideration, regarding imposition of sentence, scheduled for June 7, 2017, at 10:00AM, pursuant the factors enumerated in 18 U.S.C. § 3553(a).

Mr. Williams affirms, and agrees, with the factual assertions contained within the Offense Conduct section of the fully resolved Final Presentence Investigation Report (PSR) (ECF No. 9), as well as those representations made within the Government's Sentencing Memorandum (ECF No. 10). Further, Mr. Williams prays this Court impose the affirmatively recommended sentence as proffered by both the United States Probation Office (USPO), via the PSR (ECF No. 9), and the Government, via its Sentencing Memorandum (ECF No. 10), and sentence Mr. Williams to a term of probation of three years.

In support of the aforesaid disposition, Mr. Williams impresses upon this Court his woeful recognition of wrongdoing, and his unreserved acceptance of responsibility. As is indicative within his personal statement, attached to the PSR (PSR 5, ECF No. 9), Mr. Williams has unquestioningly learned his lesson, and remains regretful for his actions.

Without excusing his conduct, or minimizing the same, Mr. Williams avers that he is a young man, in his mid-twenties, and is the, quite remarkable, byproduct of an extremely challenging childhood. Without the benefit of parental guidance—imparting the wrongs and rights of life, and exemplifying sound morals and ethics—Mr. Williams has, nevertheless, led a drug free, law abiding, life, achieving an Associates Degree, and maintaining regular employment throughout. Despite an absent father, and a drug addicted mother—both of whom he lost at an early age—he is an unreserved family man, dedicating his life to caring for those who subsequently took care of him. To this day, his Aunt and Uncle rely on Mr. Williams' support on a daily basis, as they are literally completely dependent upon his guardianship; he is a mature young man, who uninhibitedly, and selflessly, supports his loved ones at the obvious expense of a normal social life, in his twenties.

However, despite his bittersweet achievements, and his praiseworthy attributes, Mr. Williams is only human. In an attempt to pursue his business aspirations, he took a risk—like so many others have done before him—and, like many do, his efforts failed, leaving him in significant financial debt. Desperate times often precede irrational ideas, and Mr. Williams, admittedly, acted upon them, when he should have known better. Nonetheless, what is done is done, and he knows that he shall inevitably endure the consequences of his actions—albeit, a felony conviction, familial disappointment, employment hardship, or the many other collateral corollaries he is quite cognizant. Mr. Williams has realized the inherent adverse effects of his poor decision-making.

Mr. Williams has no criminal history, and despite his enduring immense personal privation and hardship throughout his young life, he remains a commendable person; he retains great respect for the law, and has wholly learned his lesson; the instant prosecution, and the forthcoming sentence, have impressed upon him all the deterrence needed so to avoid such mistake again; and, he has never hurt anybody—in fact, he has only helped others—and the public is far better off with him in it, as contributing member of our society. He is tremendously apologetic for his actions.

Based on the foregoing, Mr. Williams respectfully prays this Court sentence him to three years of probation, as affirmatively recommended by the both the Government and the United States Probation Office.

Date: May 31, 2017

Respectfully submitted,

**/s/ Murdoch Walker II, Esq.**

Murdoch Walker II, Esq.

Ga. Bar # 163417

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**CERTIFICATE OF SERVICE**

I, as attorney for Barry Clinton Williams, certify that on May 31, 2017, I electronically filed the foregoing SENTENCING MEMORANDUM with the Clerk of the United States District Court for the Northern District of California by way of the CM/ECF system, which automatically will serve this document on the attorneys of record for the parties in this case by electronic mail.

Date: May 31, 2017

Respectfully submitted,

**/s/ Murdoch Walker II, Esq.**

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